

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Service Rules for the 698-746, 747-762 and 777-792 MHz Bands)	WT Docket No. 06-150
)	
Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems)	CC Docket No. 94-102
)	
Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones)	WT Docket No. 01-309
)	
Biennial Regulatory Review – Amendment of Parts 1, 22, 24, 27, and 90 to Streamline and Harmonize Various Rules Affecting Wireless Radio Services)	WT Docket No. 03-264
)	
Former Nextel Communications, Inc. Upper 700 MHz Guard Band Licenses and Revisions to Part 27 of the Commission's Rules)	WT Docket No. 06-169
)	
Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band)	PS Docket No. 06-229
)	
Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010)	WT Docket No. 96-86

**COMMENTS OF THE NATIONAL TELECOMMUNICATIONS
COOPERATIVE ASSOCIATION IN SUPPORT OF RTG'S
MOTION FOR EXTENSION OF TIME**

The National Telecommunications Cooperative Association (NTCA)¹ hereby supports a motion filed by the Rural Telecommunications Group (RTG)² seeking an extension of the deadline for filing reply comments in the above reference proceeding. NTCA concurs that good cause exists to extend the date for filing reply comments to June 6, 2007.

Reply comments are currently due to be filed four business days after the deadline for filing comments. Well over 100 comments have been filed, comprising thousands of pages of text. As RTG correctly points out, this proceeding is of critical importance to the rural wireless industry. NTCA's members are very much interested in this rulemaking and will seek to obtain 700 MHz spectrum to deliver advanced broadband services to their rural subscribers. Like other associations, NTCA requires additional time to review the comments and discuss the issues with its membership.

¹ NTCA is the premier industry association representing rural telecommunications providers. Established in 1954 by eight rural telephone companies, today NTCA represents 575 rural rate-of-return regulated incumbent local exchange carriers (ILECs). All of its members are full service local exchange carriers, and many members provide wireless, cable, Internet, satellite and long distance services to their communities. Each member is a "rural telephone company" as defined in the Communications Act of 1934, as amended (Act). NTCA members are dedicated to providing competitive modern telecommunications services and ensuring the economic future of their rural communities.

² Rural telecommunications Group Motion for Extension of Time in *Service Rules for the 698-746, 747-762 and 777-792 MHz Bands; Revision of the Commission's Rules to ensure Compatibility with Enhanced 911 Emergency Calling Systems; Section 68.4(a) of the Commission's Rules Governing Hearing Aid Compatible Telephones; Biennial Regulatory Review-Amendment of Parts 1, 22, 24, 27 and 90 to Streamline and Harmonize Various Rules Affecting Wireless Radio Services; Former Nextel Communications, Inc. Upper 700 MHz Guard Band Licenses and Revisions to Part 27 of the Commission's Rules; Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band; Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010*, Report and Order and Further Notice of Proposed Rulemaking, WT Docket No. 06-150, CC Docket No. 94f-102, WT Docket No. 01-209, WT Docket No. 03-264, WT Docket No. 06-169, PS Docket N. 06-229 and Wt Docket No. 96-86 (filed May 24, 2007)

Additional time to examine these issues will serve the public interest. It is essential that the Commission have a complete and meaningful record before making substantial rule changes. Parties must be afforded sufficient time to review comments, discuss them and write substantive replies. A grant of the requested one week will allow NTCA and others time to discuss the important issues raised by the comments.³ At the same time, no party will be harmed by the grant of a one week extension for reply comments

In light of the foregoing, NTCA supports the RTG request that the Commission extend the due date for reply comments in this proceeding to June 6, 2007.

Respectfully submitted,

NATIONAL TELECOMMUNICATIONS
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Date: May 25, 2007

³ NTCA notes that its Industry Committee will meet at its Arlington, Virginia offices June 4 and 5 and will discuss the 700 MHz spectrum comments.

